

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

CATHX RESEARCH LTD.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Case No. 5:21-cv-00077-RWS
	§	
2G ROBOTICS INC. a/k/a VOYIS	§	
IMAGING, INC.,	§	
	§	
<i>Defendant.</i>	§	

**DEFENDANT VOYIS IMAGING, INC.'S  
ELECTION OF ASSERTED PRIOR ART**

Pursuant to the Fourth Amended Docket Control Order (Dkt. 129), Voyis Imaging, Inc. (“Voyis”) hereby identifies the following Prior Art References with respect to the asserted claims of the patents-in-suit. Voyis also incorporates by reference its initial, supplemental, second, and third supplemental invalidity contentions. Voyis reserves the right to modify this election based on the outcome of the currently pending motions regarding the application of E.D. Tex. GO 13-20 (“General Order Adopting Model Order Focusing Patent Claims and Prior Art to Reduce Cost”) and Cathx’s request for reconsideration of the Court’s claim construction rulings. *See* Dkt. Nos. 105, 106.

<b>Patent/Application Number:</b>	<b>Country of Origin:</b>	<b>Issue/Publication Date:</b>
US 2008/0084496	United States	4/10/2008
WO 2011/143622	PCT	11/17/2011
US 2011/0228075	United States	9/22/2011
US 2012/0062963	United States	3/15/2012
US 2012/0069172	United States	3/22/2012

JP 2012/015638	Japan	1/19/2012
----------------	-------	-----------

<b>Title:</b>	<b>Date:</b>	<b>Author and Publisher:</b>
3D Visual Modeling of Hydrothermal Chimneys using a Rotary Laser Scanning System	2011	T. Nakatani et al.
Autonomous detection and volume determination of tubeworm colonies from underwater robotic surveys	2010	T. Maki et al.
Real time path-planning of an AUV based on characteristics of passive acoustic landmarks for visual mapping of shallow vent fields	2007	T. Maki et al.
Color-Accurate Underwater Imaging using Perceptual Adaptive Illumination	2010	I. Vasilescu et al.
Laser line-scan fluorescence and multispectral imaging of coral reef environments	1996	M. Strand et al.
Range-gated underwater laser imaging system based on intensified gate imaging technology	2008	J. Weiqi et al.
LUCIE ROV mounted laser imaging system	1992	G. Fournier et al.
Imaging Systems for Advanced Underwater Vehicles	2011	F. Bonin et al.
Experimentation of structured light and stereo vision for underwater 3D reconstruction	2010	F. Bruno et al.
Application of Structured Light Imaging for High Resolution Mapping of Underwater Archaeological Sites Underwater Optical Imaging: Status and Prospects	2010	C. Roman et al.
Underwater Optical Imaging: Status and Prospects	2001	J. Jaffe et al.
Underwater Optics and Imaging	2008	F. Caimi et al.
Development of the AUV Tri-TON for Imaging Rough Seafloor	August 2-3, 2012	Toshiro Maki, et al. “The 23rd Ocean Engineering Symposium,” Japan Society of Naval Architects and Ocean Engineers

<b>Title:</b>	<b>Date:</b>	<b>Author and Publisher:</b>
Volumetric Mapping of Tubeworm Colonies in Kagoshima Bay through Autonomous Robotic Surveys	Available on the ScienceDirect website at least as early as May 26, 2011	Toshiro Maki, et al. “Deep Sea Research Part I: Oceanographic Research Papers,” Volume 58, Issue 7
Deep-Ocean Use of the SM2000 Laser Line Scanner on Submarine NR-1 Demonstrates System Potential for Industry and Basic Science	Available on the IEEE Xplore website at least as early as August 6, 2002	I.R. MacDonald, et al. “Challenges of Our Changing Global Environment,” Conference Proceedings OCEANS '95 MTS/IEEE
First Sea Trials of a Laser Aided Three Dimensional Underwater Image Mosaicing Technique	Available on the IEEE Xplore website at least as early as August 30, 2011	L. Brignone, et al. OCEANS 2011 IEEE - Spain
An Approach of 3D Information Real-Time Display of Underwater Target Based on Laser Digital Scanning Grid	Available on the IEEE Xplore website at least as early as June 30, 2009	Bing Zheng, et al. OCEANS 2008
Development of a New Underwater Bathymetric Laser Imaging System: L-Bath	August 1, 2000	K. D. Moore, et al. “Journal of Atmospheric and Oceanic Technology,” Volume 17, Issue 8
Three-dimensional measurement of underwater work sites using structured laser light	September 1999	Tetlow, S., et al. Meas. Sci. Technol, 10(12): pp. 1162-1167

<b>Item for Sale or in Public Use:</b>	<b>Date:</b>	<b>Person or entity which made the information known or to whom it was made known:</b>
ULS-500 integration with the Hugin AUV (“LPP Offer For Sale”)	May 1, 2012	2G Robotics Inc. to C&C Technologies, Inc.
ULS-500 integration with the Hugin AUV (“LPP Offer For Sale”)	May 18, 2012	2G Robotics Inc. to C&C Technologies, Inc.

Dated: January 18, 2023

Respectfully submitted,

By: **BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP**

*/s/ Mircea Tipescu*

---

Mircea A Tipescu (Lead Attorney) (admitted *PHV*)  
Manish K. Mehta (admitted *PHV*)  
Zaiba Baig (admitted *PHV*)  
Greg Proctor (admitted *PHV*)  
71 South Wacker Drive, Suite 1600  
Chicago, IL 60606  
Tel: (312) 212-4949  
mtipescu@beneschlaw.com  
mmehta@beneschlaw.com  
zbaig@beneschlaw.com  
gproctor@beneschlaw.com

**JACKSON WALKER LLP**

Arthur Gollwitzer III  
Texas State Bar No. 24073336  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
Tel: (512) 236-2000  
agollwitzer@jw.com

William T. Nilsson  
Texas State Bar No. 24123350  
2323 Ross Ave., Suite 600  
Dallas, TX 75201  
Tel: (214) 953-6000  
wnilsson@jw.com

*Attorneys for Defendant 2G Robotics Inc.  
a/k/a Voyis Imaging, Inc.*

**CERTIFICATE OF SERVICE**

I, Greg Proctor, an attorney of record in this matter, hereby certify that on January 18, 2023, I emailed the following to all counsel of record:

**DEFENDANT'S ELECTION OF ASSERTED PRIOR ART**

Lance Lee  
wlancelee@gmail.com  
Attorney at Law  
5511 Plaza Dr.  
Texarkana, Texas 75503

Edward L. Bishop (*pro hac vice*)  
ebishop@bdl-iplaw.com  
Benjamin A. Campbell  
bcampbell@bdl-iplaw.com (*pro hac vice*)  
Stephanie N. White (*pro hac vice*)  
swhite@bdl-iplaw.com  
Bishop Diehl & Lee, Ltd.  
1475 E. Woodfield Rd., Ste. 800  
Schaumburg, IL 60173

/s/ Greg Proctor  
\_\_\_\_\_  
Greg Proctor